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November 16, 2024

VIA ECF

The Honorable John R. Tunheim
United States District Judge
300 South Fourth Street
Minneapolis, MN 55415

Re: United States v. Steve Shand
Case No.: 22-cr-40

Dear Judge Tunheim:

Counsel for Steve Shand writes to advise the Court that Yash Patel, who the Government indicated at the pre-trial conference will be called as a witness, should be advised of his rights before he testifies. Mr. Patel is one of the alleged illegal aliens that was detained by the Government on January 19, 2022. A review of the Government's disclosures regarding Mr. Patel reveals that he is not represented by counsel, that he does not have an agreement with the Government in relation to his testimony, and that his testimony under oath will at the minimum expose him to criminal liability for illegal entry and likely adverse immigration consequences. Counsel believes Mr. Patel should be advised of his rights and appointed an attorney prior to his testimony.

Sincerely,

s/ Aaron Morrison

Aaron Morrison
Assistant Federal Defender

AM/sls